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October 23, 2015

VIA E-MAIL TRANSMISSION AND ECF FILING

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (REG)**

Letter Regarding Update on Related Proceedings

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“New GM”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. Specifically,

1. On October 23, 2015, the Ignition Switch Plaintiffs and Ignition Switch Pre-Closing Accident Plaintiffs filed with the Second Circuit Court of Appeals the *Supplement to the Motion to Expedite (“Supplement”)*. A copy of the Supplement is attached hereto as **Exhibit “1.”**
2. Today, October 23, 2015, counsel to New GM and Lead and Liaison Counsel filed a joint letter (“Joint Letter”) addressed to Judge Furman to advise on matters of possible significance in proceedings related to MDL 2543, which includes an update on the status

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of this bankruptcy case. A copy of the Joint Letter, without exhibits,¹ is attached hereto as **Exhibit “2.”**

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

AJS/sd
Encl.

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¹ There are 19 exhibits annexed to the Joint Letter, many of which are documents that have previously been filed with this Court; the other documents do not appear relevant to this bankruptcy case. To the extent the Court believes the exhibits should be filed, New GM will do so promptly.